



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

February 3, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Keller Manufacturing Company / 061-16351-00013

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Section 112(j) Applicability Determination

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-5(f) this order is effective fifteen (15) days after it is served. When served by U.S. mail, the order is effective eighteen (18) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for a stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure
FN-112jdet.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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February 3, 2004

Mr. David Jenkins 61-50 DW
Keller Manufacturing Company, Inc.
P.O. Box 8
Corydon, IN 47112

Re: Response to Review Request No. 16351:
 Section 112(j) Applicability Determination
 Plant ID: 061-00013

Dear Mr. Jenkins:

Keller Manufacturing Company, Inc., located at 1010 Keller Drive in New Salisbury, Indiana, submitted a request for an applicability determination regarding the requirements of Section 112(j) of the Clean Air Act (CAA) on May 2, 2002. The letter was submitted in accordance with 40 CFR 63.52(d)(1) and requested that the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) determine if Keller Manufacturing Company, Inc. is subject to the requirements of Section 112(j) (40 CFR 63.50 through 63.56) for the Plywood and Composite Wood Products source category.

Pursuant to 40 CFR 63.50, the requirements of Section 112(j) will apply only if your entire source is a major source of hazardous air pollutants (HAPs) and one or more of your processes or emissions units belong in a category or subcategory for which the United States Environmental Protection Agency (U.S. EPA) has failed to promulgate an emission standard on or before the Section 112(j) deadline. IDEM, OAQ has determined that your source is subject to Section 112(j) for the Plywood and Composite Wood Products source category. An explanation of this determination is provided below.

MAJOR SOURCE DETERMINATION

The information submitted in the Part 1 MACT Application indicates that Keller Manufacturing Company, Inc. is a major source of HAPs. In addition, the Title V permit for Keller Manufacturing Company, Inc., T061-6065-00013, issued on December 21, 1998, indicates that the source is a major source of HAPs. A renewal application for this source was received on March 7, 2003 and given the following permit tracking number: T061-17576-00013. Since Keller Manufacturing Company, Inc. is a major source of HAPs, IDEM, OAQ evaluated the source categories for which Keller Manufacturing Company, Inc. requested an applicability determination.

SOURCE CATEGORY DETERMINATION

Plywood and Composite Wood Products NESHAP

IDEM, OAQ used the following information to determine if the bent plywood press at Keller Manufacturing Company, Inc. belongs to the affected source category, Plywood and Composite Wood Products:

- The Part 1 Maximum Achievable Control Technology (MACT) Application;
- The issued Title V permit for Keller Manufacturing Company, Inc.;
- The proposed federal rule from the January 9, 2003 *Federal Register*; and
- Background information available at the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plypart/plywoodpg.html>.

There is no final MACT Standard for the Plywood and Composite Wood Products source category. The proposed rule for this source category was published on January 9, 2003. Section 63.2231(a) of the proposed rule indicates that a Plywood and Composite Wood Products (PCWP) manufacturing facility is a plant site that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include (but are not limited to) plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

The Part 1 MACT Application submitted by Keller Manufacturing Company, Inc. states that the process in question consists of a single Rosenquist bent plywood press used to manufacture bent plywood components for household furniture, and that the process laminates 5-6 plies of hardwood veneer using a catalyzed urea formaldehyde resin adhesive. Based on this information it is likely that the bent plywood press at Keller Manufacturing Company, Inc. belongs to the affected source category, Plywood and Composite Wood Products

Pursuant to 40 CFR 63.52(e)(2)(i), based on the information available at this time, IDEM, OAQ has determined that the bent plywood press at Keller Manufacturing Company, Inc. belongs to the affected source category, Plywood and Composite Wood Products. If Keller Manufacturing Company, Inc. continues to meet the applicability criteria of 40 CFR 63.50 at the time of the Part 2 MACT Application deadline for this source category, Keller Manufacturing Company, Inc. shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(2)(i) and 40 CFR 63.53(b), postmarked no later than the Part 2 MACT Application deadline. The Part 2 MACT Application deadline for the Plywood and Composite Wood Products source category is April 28, 2004. The most current information regarding Section 112(j), including the promulgation schedule for the remaining MACT standards, is available on the OAQ 112(j) web page at <http://www.in.gov/idem/air/permits/112j>. For the most current information regarding this source category, refer to U.S. EPA's Air Toxics Website for the Plywood and Composite Wood Products source category at <http://www.epa.gov/ttn/atw/plypart/plywoodpg.html>. Since less than three years remain on the term of your Title V operating permit, IDEM, OAQ will not reopen your permit but will include all applicable MACT requirements in your permit upon renewal. IDEM, OAQ will revise the draft Title V operating permit renewal, T061-17576-00013, to include all applicable MACT requirements.

If U.S. EPA promulgates a final MACT standard prior to IDEM, OAQ issuing a permit containing the Section 112(j) determination requirements, a source is no longer subject to Section 112(j) for that source category, including the requirement to submit a Section 112(j) Part 2 MACT Application. A source is still subject to Section 112(j) for any other source categories that do not have promulgated MACT standards.

This determination is based on the information provided by Keller Manufacturing Company, Inc., IDEM, OAQ records, and the information currently available from the U.S. EPA. Note that if additional equipment or capacity is added or operational practices are changed (e.g., switching solvents from a solvent that contains no HAPs to a solvent containing HAPs), the Section 112(j) requirements may be triggered in accordance with 40 CFR 63.52(b). If the events described in 40 CFR 63.52(b) occur at the

source, Keller Manufacturing Company, Inc. shall submit a Part 1 MACT Application in accordance with the requirements and schedule contained in 40 CFR 63.52(b).

Questions should be directed to Kim Cottrell, IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Kim Cottrell at extension 3-0870, or dial (317) 233-0870.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

KLC

CC: File – Harrison County
Harrison County Health Department
Air Compliance – Ray Schick
Eastern Research Group
Administration Section
U.S. EPA Region V – Genevieve Damico